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January 17, 2023

## VIAECF

The Honorable Lewis J. Liman United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Jackpocket, Inc. v. Lottomatrix NY LLC, et al., No. 1:22-cv-05772 (LJL) (S.D.N.Y.)

Dear Judge Liman:

Pursuant to Rule 2(H)(ii) and Attachment B of Your Honor's Individual Practices in Civil Cases, Defendants Lottomatrix NY LLC, Lottomatrix Corporation, Lottomatrix Operations Limited d/b/a Jackpot.com, Lottomatrix Malta Limited, and 99Dynamics Limited (collectively "Jackpot.com" or "Defendants") respectfully move the Court for approval to file under seal, at Plaintiff Jackpocket, Inc.'s ("Plaintiff") request, the concurrently filed Memorandum of Law in Support of Defendants' Motion For Attorneys' Fees and Related Nontaxable Expenses (the "Motion").

The basis for Jackpot.com's request to seal is that the Motion "contains information marked confidential by [Plaintiff]." Individual Practices, Att. B. Specifically, the Motion quotes from and refers to the contents of certain documents produced by Plaintiff and certain deposition testimony of Plaintiff's CEO, Peter Sullivan, which Plaintiff has designated confidential. The Motion also quotes from Mr. Sullivan's trial testimony, which testimony is contained in a transcript that currently remains under seal. Counsel for Jackpot.com informed counsel for Plaintiff that the Motion contains such designated discovery material and sealed transcript testimony, and counsel for Plaintiff confirmed that Plaintiff requests the Motion be filed under seal.

Pursuant to the procedures set forth in Your Honor's Individual Rules, Jackpot.com is filing the Motion under seal and understands that Plaintiff, as the "Producing Party," will file a separate letter motion "explaining the particular reasons for seeking to keep the [Motion] with redactions or under seal, and attach as an exhibit the [Motion] with the confidential information redacted." Individual Practices, Att. B.

Accordingly, Jackpot.com respectfully requests that the Court grant its request to file the Motion temporarily under seal. Jackpot.com takes no position concerning the appropriateness of any particular reductions Plaintiff may propose.

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Respectfully submitted,

Rachel E. Epstein

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Attorneys for Defendants